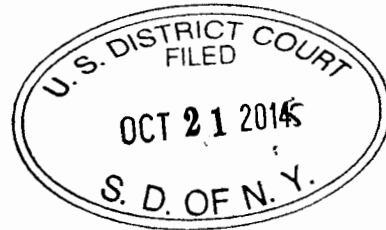


15 MAG 3787 ORIGINAL

Approved: MATTHEW PODOLSKY
Assistant United States Attorney



Before: THE HONORABLE ANDREW J. PECK
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA :
: COMPLAINT
:
- v. - : Violations of 18 U.S.C.
: §§ 1542, 1028A, and 2
FNU LNU, :
a/k/a "Harvel Thomas," : COUNTY OF OFFENSE:
a/k/a "Edward Hogan," : NEW YORK
a/k/a "Terrell Cooley," :
a/k/a "Nayquan Nicholas," :
a/k/a "Stone Love," :
Defendant. :
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SOUTHERN DISTRICT OF NEW YORK, ss.:

ELIZABETH WALL, being duly sworn, deposes and says that she is a Special Agent with the Diplomatic Security Service ("DSS") of the United States Department of State, and charges as follows:

COUNT ONE

(False Statement in Application for Passport)

1. On or about September 18, 2006, in the Southern District of New York and elsewhere, FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a "Nayquan Nicholas," a/k/a "Stone Love," the defendant, willfully and knowingly did make false statements in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, to wit, FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a "Nayquan Nicholas," a/k/a "Stone Love," submitted

a United States passport application containing false information about his identity, including a false name, date of birth, and Social Security Number.

(Title 18, United States Code, Sections 1542 and 2.)

COUNT TWO
(Aggravated Identity Theft)

2. On or about September 18, 2006, in the Southern District of New York and elsewhere, FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love," the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love," possessed, used, and transferred the name and other personal identification information of another person in connection with his fraudulent passport application, as charged in Count One of this Complaint.

(Title 18, United States Code, Sections 1028A and 2.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

3. I am a Special Agent with the DSS. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, on my conversations with other law enforcement officials, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Through my training and experience as a DSS agent, I have learned the following about the passport application process:

a. To obtain a United States passport, an individual must submit a passport application with information such as the applicant's name, date of birth, Social Security

Number, and address. A photograph of the applicant must be affixed to the application.

b. The applicant must appear in person before a passport acceptance agent. Before approving any application for a passport, the passport acceptance agent will require the applicant to provide photo identification and proof of citizenship, such as a driver's license and birth certificate, and will verify that the applicant appears to be the same person as the person in the photo identification as well as the same person in the photograph affixed to the passport application. The applicant must then sign the application, thereby certifying that the information on the application is true and correct.

c. If the application is approved, the applicant will be issued a United States passport.

5. Based on my conversations with other law enforcement officers and my review of records maintained by law enforcement, including immigration records, I have learned the following:

a. On or about September 18, 2006, an application ("Application-1") was made at Manhattanville Station, New York, NY, for a United States passport. Application-1 was made in the name of "Edward Hogan" and listed a particular date in 1990 ("Birthdate-1") as the applicant's date of birth and a particular social security number ("Social Security Number-1") as the applicant's social security number. Application-1 also included a particular photograph ("Photograph-1") as a photograph of the applicant.

b. On or about October 16, 2006, based on the information included in Application-1, a United States passport ("Passport-1") was issued in the name of "Edward Hogan," listing Birthdate-1 and Social Security Number-1, and containing Photograph-1.

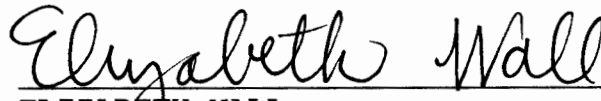
c. On or about July 15, 2013, an individual named Edward Hogan ("Victim-1") was arrested by the New York City Police Department for homicide and has been in custody since. Victim-1's birthdate is Birthdate-1 and Victim-1's Social Security Card lists Social Security Number-1 as Victim-1's Social Security Number.

d. On or about March 8, 2015, an officer of the New York City Police Department arrested FNU LNU, a/k/a "Harvel

Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love," the defendant, for shoplifting. FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love," stated that his name was Edward Hogan and presented the officer with Passport-1 as his identification.

6. Based on my review of Photograph-1 and photographs of Victim-1 and of FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love," the defendant, I believe that Victim-1 is not the individual depicted in Photograph-1 and that FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love," is the individual depicted in Photograph-1.¹

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love," the defendant, and that he be arrested and imprisoned or bailed, as the case may be.

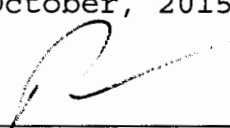


ELIZABETH WALL

Special Agent

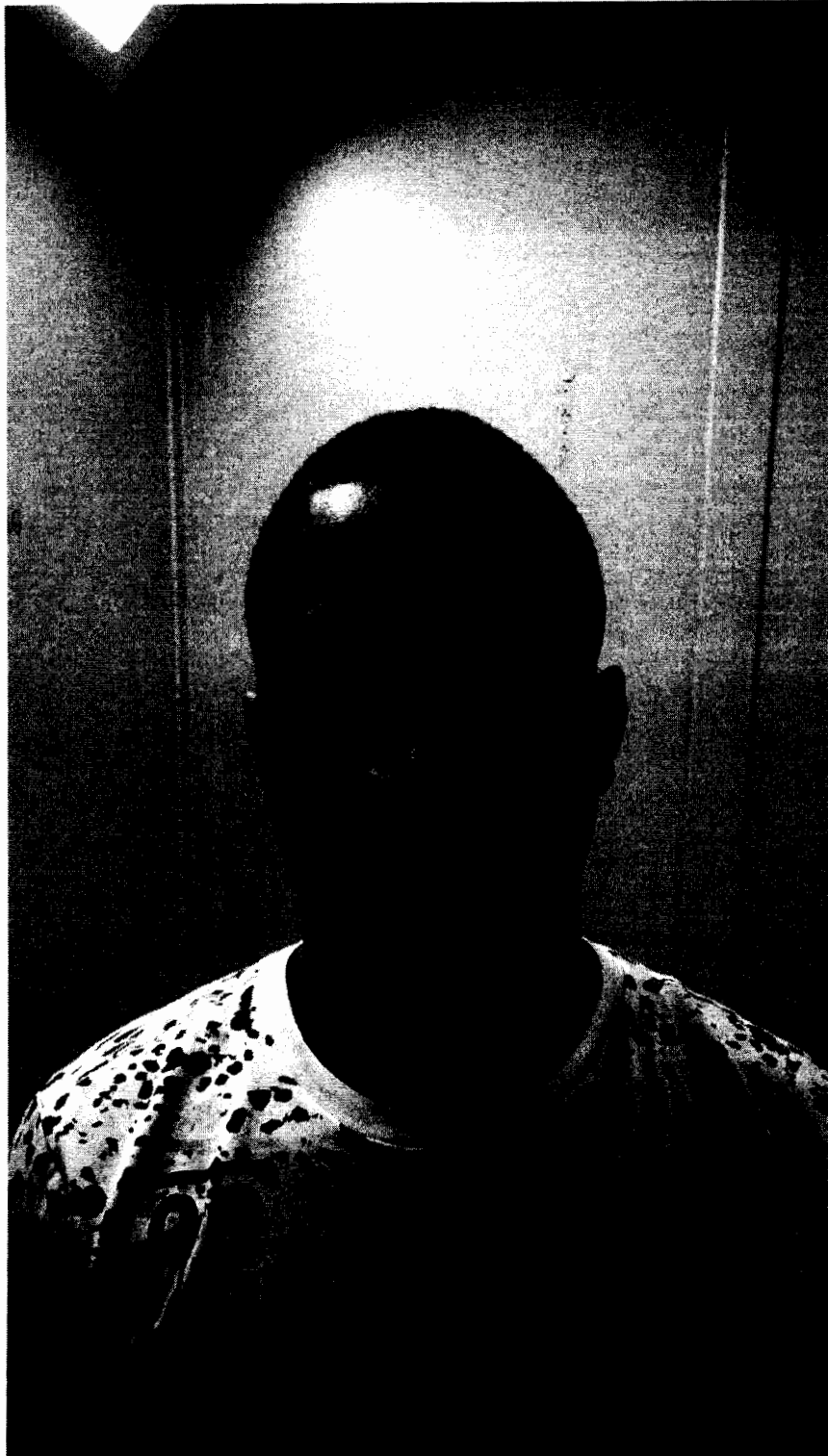
United States Department of State
Diplomatic Security Service

Sworn to before me this
__th day of October, 2015



THE HONORABLE ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

¹ A photograph of FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love," the defendant, is attached hereto and to the requested arrest warrant.



FNU LNU, a/k/a "Harvel Thomas," a/k/a "Edward Hogan," a/k/a "Terrell Cooley," a/k/a Nayquan Nicholas," a/k/a "Stone Love"